

ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED

OCT 24 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)

Rules for the Filing of International)
Circuit Status Reports)

CC Docket No. 93-157

DOCKET FILE COPY ORIGINAL

INFORMAL REPLY COMMENTS

WorldCom, Inc. ("WorldCom") hereby files Informal Reply Comments on the Draft Manual for Filing Section 43.82 Circuit Data. WorldCom supports the Informal Comments filed by Sprint Communications Company, L.P. ("Sprint") and objects to the Commission's refusal to allow all of the circuit reports to be filed confidentially and to the level of detail required by the Draft Manual.

WorldCom agrees with Sprint that the information required by the Draft Manual, especially the very detailed information, is competitively sensitive, and, if required, should be entitled to confidentiality. As Sprint notes, the information required by the Draft Manual, together with the information reported in the 43.61 international traffic data reports and the regulatory fee reports, would allow carriers to determine exactly how many circuits competing carriers own, how they are being used, and the amount of revenue being derived from these facilities. Publishing this information would have a disproportionate adverse impact on smaller carriers, such as WorldCom and Sprint, because larger carriers, which have far more resources for analyzing data than do smaller carriers, could use the information to gain a competitive advantage.

No. of Copies rec'd
List A B C D E

014

WorldCom agrees with Sprint that the level of detail required by the Draft Manual will place an unreasonable burden on carriers because it will require extensive adjustments to be made to the computer systems which process the circuit data, and many hours to be spent compiling the data into the required format. As Sprint points out, all common carriers already file (i) 43.61 international traffic data reports, which include country-by-country data reported by service type, billing type, and point of origination, and (ii) regulatory fee reports, which report the number of active international 64 Kbps circuits or equivalents. Between these two reports, the Commission is provided with sufficient information to monitor circuit use and to achieve its goals.


In particular, WorldCom agrees with Sprint's opposition to the requirement that private line services be reported in six sub-categories, based on transmission speed. WorldCom agrees with Sprint that this requirement would be extremely burdensome. WorldCom's databases do not track circuits based on transmission speed, and modifying them to do so would require a great deal of work. WorldCom agrees with Sprint that this requirement is not necessary because the Draft Manual requires carriers to report circuits by service type and the sub-categories within the private line service type do not provide additional useful information.

Requiring carriers to report circuits by service type is, in itself, a difficult requirement to comply with accurately. As Sprint points out, facilities-based carriers usually do not know how a circuit sold to a non-facilities-based carrier or a large business customer will be used. In addition, if a private line is used for the provision of switched voice service to a country which provides equivalent resale opportunities, this circuit would incorrectly be reported as a private line circuit. Finally, it would be impossible to provide accurate data by service type

because private line circuits can be used to provide services such as telex and packet switched data services, which are separate categories.

WorldCom also agrees with Sprint that the Draft Manual is inconsistent with the Commission's recent moves towards streamlined regulation and processing. The level of detail required by the Draft Manual is unnecessary and would create a significant burden on carriers, especially smaller carriers which have fewer resources with which to prepare the data. WorldCom supports Sprint's proposal that the Commission require carriers to report the number of active 64 Kbps circuits or equivalent by type of facility, but proposes that idle circuits not be reported. In addition, WorldCom proposes that any reports filed pursuant to Section 43.82 be filed on a confidential basis.

Respectfully submitted,


Robert S. Koppel
Tally Frenkel
WorldCom, Inc.
15245 Shady Grove Road, Suite 460
Rockville, MD 20850
(301) 212-7099

October 24, 1995

CERTIFICATE OF SERVICE

I, Susanne Deljoubar, hereby certify that I have this 24th day of October, 1995 sent a copy of the foregoing "Informal Reply Comments" by first-class U.S. Mail, postage prepaid to the following:

Scott Blake Harris
Chief, International Bureau
Federal Communications Commission
Room 800, Mail Stop 0800
2000 M Street, NW
Washington, DC 20554

Shannon Coombs
Administrative Office
International Bureau
Federal Communications Commission
Room 812 C
2000 M Street, N.W.
Washington, D.C. 20554

James Lande
Industry Analysis Division
Common Carrier Bureau
Federal Communications Commission
Room 530-G
1919 M Street, NW
Washington, DC 20554

Bob Gosse
International Bureau
Federal Communications Commission
Room 832
2000 M Street, NW
Washington, DC 20554

Leon Kestenbaum
Marybeth Banks
Sprint
1850 M Street, NW
Washington, D.C. 20036



Susanne Deljoubar